

MEMO ENCLOSED

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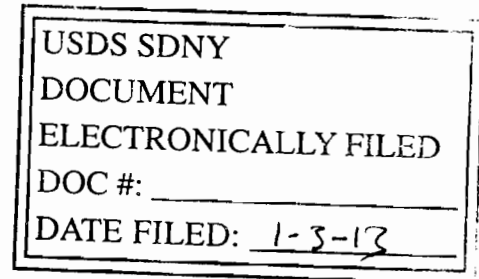
JOSHUA L. DRATEL  
—  
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January 2, 2014

**BY ELECTRONIC MAIL**

The Honorable Richard J. Sullivan  
United States District Judge  
Southern District of New York  
United States Courthouse  
40 Centre Street  
Courtroom 905  
New York, New York 10007



Re: United States v. Stephen Basciano,  
13 Cr. 340 (RJS)

Dear Judge Sullivan:

This letter is in regard to above-entitled case, in which I represent defendant Stephen Basciano, and relates to the current schedule for motions, which are due Monday, January 6, 2014. It is respectfully requested that the due date for motions be adjourned until January 17, 2014. I have spoken with Assistant United States Attorney Rebecca Mermelstein, and the government consents to this application as long as the government has the same time to respond as initially provided.

In fact, the proposed new schedule would not effect any substantive change in the case schedule. Affording the government the same two weeks to respond would make its submission due January 31, 2014. Defendants would file their reply a week later, February 7, 2014, two weeks in advance of the next scheduled pretrial conference, which is set for February 21, 2014, at 9:30 a.m.

The reasons for the requested adjournment are as follows: (1) the intervening holidays, and the interruptions they cause; (2) Matthew J. Mari, Esq., counsel for defendant Joseph Basciano, is in the process of moving his office; and (3) one of the motions will challenge the

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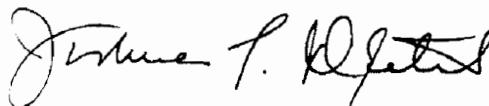
electronic surveillance, and such a motion is inevitably more complicated and fact-intensive. Moreover, certain defendants will file joint motions (and/or join in motions made by other defendants, obviating repetition), and the additional time will facilitate the process of review, revision, and consensus on the content of those joint motions.

Accordingly, it is respectfully requested that the motion schedule be adjusted as follows:

Defendants' motions:	due January 17, 2014
Government's reponse:	due January 31, 2014
Defendants' reply:	due February 7, 2014

As noted above, the date of the next pretrial conference, February 21, 2014, would remain the same. Also, again as noted above, the government consents to this application.

Respectfully submitted,



Joshua L. Dratel

JLD/

cc: Rebecca Mermelstein  
Assistant United States Attorney

All Defense Counsel

SO ORDERED

Date:

1/2/14



RICHARD J. SULLIVAN  
U.S.D.J.